

**REMARKS**

Claims 1-4 and 7-20 are all the claims pending in the application.

**I. Objections to the Specification**

The Examiner objected to paragraphs [034] and [036] of the specification because of various informalities. Applicant hereby amends paragraphs [034] and [036] of the specification to cure the informalities noted by the Examiner. Applicant respectfully requests that the Examiner withdraw the objections to the specification.

**II. Claim Rejections under 35 U.S.C. § 103(a)**

Claims 1-4 and 7-20 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,564,215 to Hsiao et al. (hereinafter "Hsiao") in view of U.S. Patent Application Publication No. 2003/0069902 to Narang et al. (hereinafter "Narang"). Applicant respectfully traverses this rejection and respectfully requests that the Examiner reconsider the rejection at least in view of the following comments.

With respect to claim 1, the Examiner asserts that Hsiao teaches the following features, recited *inter alia* in claim 1:

identifying a version of the item based on a first time;

[...]

identifying a version of the object based on a second time when the request affects the object, wherein identifying the version of the object comprises retrieving a timestamp and an identifier for the object;

[...]

wherein the item comprises a library identifier to a managed resource which is external to a library,

wherein the object comprises a binary object which is stored in at least one of a file system, a file server, a file archive, or a database separate from the library

Applicant respectfully disagrees. The Examiner points to col. 6, lines 50-66 of Hsiao as allegedly teaching both “identifying a version of the item” and “identifying a version of the objection” (see page 5 of the Office Action). Applicant, however, respectfully notes that the File\_Version table appears to store information about particular files and thus, at best, may store version information related to particular files. Hsiao does not teach or fairly suggest how this information may be used to identify a version of a file (alleged object), much less “identifying a version of the item based on a first time,” where “the item comprises a library identifier to a managed resource which is external to a library.”

For example, FIG. 3 of Hsiao, reproduced below for the Examiner’s convenience, shows the various types of data that are stored in the File\_Version table. Applicant respectfully submits that it is unclear how the data stored in FIG. 3 meets the claim limitations of “identifying a version of the item based on a first time,” where “the item comprises a library identifier to a managed resource which is external to a library.” The only version information stored in the table, VERSION\_NUM, appears to relate to a version of the file (alleged object), and not to any item. Accordingly, Applicant respectfully submits that Hsiao does not teach or fairly suggest “identifying a version of the item based on a first time.”

**FILE\_VERSION TABLE**

<u>ATTRIBUTE</u>	<u>DEFINITION</u>
FSID	FILE SYSTEM ID
INODE	INODE NUMBER OF THE FILE
CELLID	CELL ID
UPDATER	USERID
PENDING_FLAG	FILE STATUS FLAG
LAST_MOD_TIME	LAST MODIFICATION TIME OF THE FILE WHEN LINKED
UPDATE_TIMESTAMP	TIME THE FILE IS UPDATED
BACKUP_SEQUENCE_NUMBER	FOR GARBAGE COLLECTION
URL	FILE IDENTIFIER
ARCHIVE_FILE_NAME	ARCHIVE FILE NAME
UNIQUE_RECOVERY_ID	UNIQUE IDENTIFIER EMBEDDED IN URL+
VERSION_NUM	FILE VERSION NUMBER

Additionally, as mentioned above, Applicant respectfully submits that the Examiner does not explain, and the Hsiao reference does not teach or fairly suggest, how information stored in the File\_Version table may be used for “identifying a version of the object based on a second time when the request affects the object, wherein identifying the version of the object comprises retrieving a timestamp and an identifier for the object,” as required by the claim.

Accordingly, Applicant respectfully submits that Hsiao does not teach or fairly suggest these claim features. Furthermore, the disclosure of Narang does not cure these deficiencies of Hsiao.

Applicant further respectfully disagrees with the Examiner’s assertion that Hsiao teaches, “rolling back the request,” and “the rolling back the request includes removing an entry for the request from a library server transaction table,” as recited in claim 1. The Examiner points to

col. 9, lines 30-33 of Hsiao, however, Applicant respectfully notes that Hsiao merely describes deleting a record for a file from the File\_Version table, when there is a Reset\_Pending request (see col. 9, lines 30-33 of Hsiao). According to Hsiao, the File\_Version table includes information about file versions (see col. 6, line 65 through col. 7, line 4 of Hsiao). The File\_Version table **does not include entries for requests/information about library server transactions**, and accordingly, a person of ordinary skill in the art would understand that deleting a record for a file from the File\_Version table cannot be the same as “removing an entry for the request from a library server transaction table.”

Accordingly, Applicant respectfully submits that Hsiao does not teach or fairly suggest this claim feature. Furthermore, the disclosure of Narang does not cure this deficiency of Hsiao.

Finally, Applicant respectfully notes that the Examiner concedes that Hsiao does not teach “when the request is found invalid,” as recited in claim 1, however, the Examiner asserts that Narang teaches this feature. Applicant respectfully disagrees and respectfully submits that Narang does not teach or fairly suggest this feature.

According to Narang, when the last modification time stamp of an object does not match with the last modification time stamp for the latest committed version of the object, an error may be generated to indicate that the handle refers to stale content in the object (see paragraph 0023 of Narang). Thus, Applicant respectfully submits that Narang, at best, describes determining that a handle refers to invalid content in an object, rather than a request being found invalid, as required by the claim.

At least for these reason, Applicant respectfully submits that independent claim 1 is patentable over the combination of Hsiao and Narang.

Independent claims 9, 10, and 18-20 recite features similar to the features discussed above with respect to claim 1. Accordingly, Applicant respectfully submits that claims 9, 10, and 18-20 are patentable over the combination of Hsiao and Narang at least for the reasons discussed above with respect to claim 1.

Applicant further submits that claims 2-4, 7, 8, and 11-17 are patentable over the combination of Hsiao and Narang at least by virtue of their dependency on claims 1 or 10.

### III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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**46159**

CUSTOMER NUMBER

Date: June 21, 2011